

Columbia Forest Products
Aroostook County
Presque Isle, Maine
A-353-71-H-R (SM)

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**Departmental
Findings of Fact and Order
Air Emission License**

After review of the air emissions license renewal application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Columbia Forest Products of Presque Isle, Maine has applied to renew their Air Emission License permitting the operation of emission sources associated with their wood processing facility.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate</u>	<u>Fuel Type, % sulfur</u>	<u>Control Device</u>	<u>Stack #</u>
Boiler #1	15	1.7 tons/hr	wood	multiclone	1
Boiler #2	15	1.7 tons/hr	wood	multiclone	2
Boiler #3	24	1.9 tons/hr	wood	multiclone	B3
	29.44	210 gal/hr	#2 oil, 0.35%		
Energex (Veneer Dryer #1)	27	3.0 tons/hr	wood	multiclone	V1
Proctor Dryer (Veneer Dryer #1)	15	107 gal/hr	#2 oil, 0.35%	None	V1

Process Equipment

<u>Equipment</u>	<u>Production Rate</u>	<u>Pollution Control Equipment</u>	<u>Stack #</u>
Veneer Dryer #2	40 feet per minute	None	V2
Veneer Dryer #3	160 feet per min.	None	V3
Re-Splicing Process	~ 45,000 lbs. resin/year	None	fugitive
Wood Handling System	--	Cyclones #1, #2 & #3	--

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C. Application Classification

The application for Columbia Forest Products does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of current licensed emission units only and has been processed through Chapter 115 of the Department's regulations. With the fuel limit on Boilers #1, #2 and #3 and Veneer Dryer #1, the facility is licensed below the major source thresholds and is considered a synthetic minor.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Bureau of Air Quality regulations. BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology,
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Process Description

Columbia Forest Products produces hardwood (mostly birch and maple) veneer in 8-foot and 10-foot lengths on two separate veneer lines. Pre-graded logs are received and sorted by species in the wood yard. The logs are then conditioned in one of nine steam heated "vats" for 42 to 66 hours. The "vats" are similar to wood kilns, without the fans. After treatment in the vats, the logs are debarked and cut to length. A laser reads the contour of the log and a computer calculates how to move the log to obtain the best cutting path. A thin "sheet" of wood veneer is sliced off the log with a lathe and wound onto a spool. Veneer rejects are either re-spliced or sent to customers for use as is. The remaining tree cores are made into pallets for shipping.

The veneer is un-spooled into one of the facility's three Veneer Dryers. Veneer Dryer #1 is a direct-contact dryer with an Energex burner capable of firing wood and a Proctor Dryer consisting of three oil-fired heaters. Veneer Dryer #1 serves the 10-foot veneer line. Veneer Dryers #2 and #3 are indirect-contact units. It passes through the dryer in a looping pattern, while steam at high pressure further dries the wood. The last section of the dryer is a cooler which uses ambient air to halt the drying process.

Defects are marked as the veneer exits the dryer. A computer calculates the best way to cut the sheets to get the best value from the wood. Defect-free sheets are cut to width, taped for shipping, graded and sorted for shipment to customers who use the veneer to make plywood and for woodworking purposes. Sheets with defects must be cut to smaller sizes. These pieces pass through a jointer which applies glue to the thin edges and joins both sides of the wood. Another machine re-splices the pieces into whole sheet sizes. The re-splicing process may be used to obtain specific grain patterns. The re-spliced pieces are trimmed to size, taped, graded, sorted and shipped.

Columbia Forest Products operates three boilers to provide process steam and facility heat. All three boilers fire wood waste from throughout the process; Boiler #3 is also permitted to fire #2 fuel oil.

Columbia Forest Products routinely records data based on ten (10) operating periods per year. Each period is between 5 and 6 weeks in duration. For this reason, Columbia Forest Products will record and report data for compliance purposes on an operating period basis rather than a monthly basis.

C. Boilers #1 and #2

Boilers #1 and #2 are operated for process steam and facility heating needs. Each boiler has a maximum capacity of 15 MMBtu/hr, firing wood waste (calculations are based on wood at 50% moisture with a heat capacity of 4500 Btu/lb.) Boilers #1 and #2 were manufactured in 1962 by ERIE and are therefore not subject to EPA's New Source Performance Standards (NSPS) Subpart Dc, for steam generating units greater than 10 MMBtu/hr manufactured after June 9, 1989. Emissions from each boiler pass through multiclones and exhaust through separate 65-foot stacks (stacks #1 and #2).

Columbia Forest Products was previously licensed to fire no greater than 10,000 tons wood fuel per year in Boilers #1 and #2. Columbia Forest Products has not proposed an increase in this limit and shall continue to be limited to firing no greater than 10,000 tons per year of wood in Boilers #1 and #2 on a ten-period rolling total basis.

A summary of the BPT analysis for Boilers #1 (15 MMBtu/hr) and #2 (15 MMBtu/hr) is the following:

1. Chapter 103 regulates PM emission limits. The PM₁₀ limit is based on AP-42 data dated 9/03 for the combustion of bark and wet wood controlled with a mechanical collector.
2. SO₂, NO_x, CO and VOC emissions rates are based on AP-42 emission factors dated 9/03 for wood combustion.

3. Visible emissions from each of the boiler's stacks (Stacks #1 and #2) shall not exceed 30% opacity on a 6-minute block average, except for 2 six-minute block averages in a 3-hour period.

D. Boiler #3

Columbia Forest Products installed Boiler #3 in 2003. The boiler has a maximum design heat input capacity of 24 MMBtu/hr firing wood at a rate of 1.9 tons per hour (calculations are based on wood at 50% moisture with a heat capacity of 4500 Btu/lb.)

Boiler #3 is also equipped with a secondary oil-fired burner that will be disconnected during periods of wood fire and moved into place when needed to provide supplemental heat during wood start-up or periods when wood fuel is unavailable. The secondary burner will fire #2 fuel oil or kerosene with a maximum design heat input capacity of 29.4 MMBtu/hr capable of firing oil at a rate of 210 gallons per hour.

Since Boiler #3 has a maximum heat input capacity greater than 10 MMBtu/hr, and was manufactured in 2003, the boiler is therefore subject to NSPS Subpart Dc for steam generating units greater than 10 MMBtu/hr and manufactured after June 9, 1989. The following are the applicable requirements from the subpart:

1. Standard for sulfur dioxide: 60.42c;
2. Emission monitoring for sulfur dioxide: 60.46c; and,
3. Reporting and record keeping requirements: 60.48c.

Air Emission License A-353-71-H-R established the BACT requirement for fuel oil sulfur content at no greater than 0.35% sulfur by weight. In accordance with 40 CFR Part 60.42c, paragraph h. (1), Columbia Forest Products shall demonstrate compliance with SO₂ emissions limits and fuel oil sulfur limits through certification from the fuel oil supplier.

In accordance with 40 CFR Part 60.46c(e) the SO₂ emission monitoring requirements of 40 CFR Part 60.46c shall not apply to Columbia Forest Products where the facility shall demonstrate compliance with SO₂ standard based on fuel supplier certification as described in 40 CFR Part 60.48c(f)(1).

Columbia Forest Products shall comply with the applicable reporting and record keeping requirements of 40 CFR Part 60.48c.

Boiler #3 is equipped with a high efficiency multiclone collector for particulate control. The multiclone has a manufacturer's guarantee to have higher control efficiency than standard conventional multi-tube cyclones.

Air Emission License A-353-71-H-R established the BACT determination for CO emissions from Boiler #3 which was based on the proposed Industrial Boiler MACT standard for CO. Boiler MACT (40 CFR Part 63 Subpart DDDDD) applies to facilities that are major sources of Hazardous Air Pollutants. Although Columbia Forest Products is not such a source and therefore not subject to the Boiler MACT standards, CO emission limits during wood-firing continue to be based on the Boiler MACT CO standard for new or reconstructed large solid fuel boilers.

The promulgated standard is 400 ppm on a dry basis, corrected to 7% O₂, which converts to approximately 0.405 lb/MMBtu using the Fuel Factor Formula shown below:

$$lb / MMBtu_{CO} = F_{d,wood} \times \frac{M_w}{385} \times \left(\frac{CO \text{ conc.} [ppmv]}{10^6} \right) \times \frac{20.9}{20.9 - \%O_2}$$

Where:

$lb / MMBtu_{CO}$ = CO concentration in lb/MMBtu

$F_{d,wood}$ = The volume of dry exhaust gas produced by the combustion of one MMBtu of wood at zero excess air. Its value is 9240 dscf/MMBtu.

M_w = The molecular weight of CO.

$CO \text{ conc.} [ppmv]$ = The concentration of CO in parts per million by volume.

$\%O_2$ = The percent excess oxygen.

Columbia Forest Products was previously licensed to fire no greater than 15,000 tons wood fuel per year and 1,250,000 gallons per year of #2 fuel oil in Boiler #3. Columbia Forest Products has not proposed an increase in this limit and shall continue to be limited to firing no greater than 15,000 tons wood fuel per year and 1,250,000 gallons per year of #2 fuel oil in Boiler #3 on a ten-period rolling total basis.

A summary of the BPT analysis for Boiler #3 (24 MMBtu/hr firing wood and 29.44 MMBtu/hr firing oil) is the following:

1. BPT for emissions of PM from the firing of wood is 0.17 lb/MMBtu as guaranteed by the cyclone manufacturer.
2. BPT for emissions of PM₁₀ from the firing of wood is 0.10 lb/MMBtu as guaranteed by the cyclone manufacturer.

3. BPT for emissions of PM and PM₁₀ from the firing of oil is 0.10 lb/MMBtu as guaranteed by the cyclone manufacturer.
4. SO₂ emissions from the firing of wood are established using AP-42 factors dated 3/02.
5. SO₂ emissions from the firing of oil are regulated by 40 CFR 60.42c. BPT for Boiler #3 is the use of fuel oil with a sulfur content not to exceed 0.35% by weight, which meets the requirements of 40 CFR 60.42c(d). SO₂ emission limits from the firing of oil are based on the firing of fuel oil with 0.35% sulfur, by weight.
6. NO_x and VOC emission limits were calculated based on AP-42 emission factors dated 3/02 for wood combustion and 9/98 for fuel oil combustion.
7. CO emissions from the firing of wood are based on the Boiler MACT CO standard for new or reconstructed large solid fuel boilers of 400 ppm on a dry basis, corrected to 7% O₂.
8. CO emissions from the firing of oil were calculated based on AP-42 emission factors dated 9/98.
9. Visible emissions during periods of wood combustion or during periods of combusting wood and oil in combination shall not exceed 30% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a 3-hour period.
10. Visible emissions during periods of oil combustion only shall not exceed 20% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a 3-hour period.

E. Veneer Dryer #1

Columbia Forest Product's current license allows for the operation of a direct contact veneer dryer designated Veneer Dryer #1. The dryer was manufactured in 1973 by Proctor Schwartz to burn oil and was later modified in 1986 to also burn wood. Veneer Dryer #1 utilizes the exhaust gases from the combustion of the wood or #2 fuel oil to dry veneer.

The Veneer Dryer #1 makes use of an Energex Combustion unit to fire wood at a maximum design heat input capacity of 27 MMBtu/hr firing wood with a 50% moisture content. Veneer Dryer #1 also makes use of three #2 fuel oil firing burner units (designated Heaters #1, #2 and #3) to supply combustion gases to the dryer during periods that wood is not available. The three #2 fuel oil firing burners have maximum design heat input capacities of 5.0 MMBtu/hr each for a total maximum design heat input capacity of 15 MMBtu/hr.

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Veneer Dryer #1 exhausts to a 28.6 foot high stack. A previous ambient air quality analysis showed that Veneer Dryer #1 would not meet Maine Ambient Air Quality Standards during periods of wood firing unless the stack height was raised to 65.0 feet. A recent ambient air quality analysis determined that Columbia Forest Products does not exceed Maine Ambient Air Quality Standards at the current stack height during periods of firing only #2 fuel oil with a sulfur content of no greater than 0.35% sulfur by weight.

Columbia Forest Products shall raise stack #V1 and submit documentation to the Department indicating that the Veneer Dryer's stack has been extended to 65-feet before wood is fired in the Energex wood burner in Veneer Dryer #1.

Veneer Dryer #1 is equipped with a high efficiency multiclone collector for particulate control during periods of wood-firing. The multiclone has a manufacturer's guarantee to have higher control efficiency than standard conventional multi-tube cyclones.

Columbia Forest Products was previously licensed to fire no greater than 8,760 tons wood fuel per year and 250,000 gallons per year of #2 fuel oil in Veneer Dryer #1. Columbia Forest Products has not proposed an increase in this limit and shall continue to be limited to firing no greater than 8,760 tons wood fuel per year and 250,000 gallons per year of #2 fuel oil in Veneer Dryer #1 on a ten-period rolling total basis

VOC lb/hr emission rates for Veneer Dryer #1 firing wood and oil characterize emissions from the combustion process only and do not include VOC emissions from the drying of hardwood veneer. Emissions from the drying of veneer are addressed in the 'Veneer Drying Process VOCs' section of this license.

A summary of the BPT analysis for Veneer Dryer #1 (27 MMBtu/hr firing wood and 15 MMBtu/hr firing oil) is the following:

1. Chapter 103 regulates PM emission limits from the firing of oil. The PM₁₀ limit is based on the PM limit.
2. BPT for emissions of PM from the firing of wood is 0.17 lb/MMBtu as guaranteed by the cyclone manufacturer.
3. BPT for emissions of PM₁₀ from the firing of wood is 0.10 lb/MMBtu as guaranteed by the cyclone manufacturer.
4. SO₂ emissions from the firing of wood are established using AP-42 factors dated 3/02.

5. MEDEP Chapter 106 regulates the sulfur content of the fuel oil fired in Veneer Dryer #1. BPT for Veneer Dryer #1 is the use of fuel oil with a sulfur content not to exceed 0.35% by weight, which meets the requirements of MEDEP Chapter 106. SO₂ emission limits from the firing of oil are based on the firing of fuel oil with 0.35% sulfur, by weight.
6. NO_x, CO and VOC emissions from the firing of oil are based on AP-42 emission factors dated 9/98. The VOC lb/hr emission rate does not include VOC emissions from the drying of hardwood veneer.
7. NO_x, CO and VOC emissions from the firing of wood are based on AP-42 emission factors dated 9/03. The VOC lb/hr emission rate does not include VOC emissions from the drying of hardwood veneer.
8. Visible emissions from Veneer Dryer #1 during periods of wood firing shall not exceed 30% opacity on a 6-minute block average, except for two 6-minute block averages in a 3-hour period.
9. Visible emissions from Veneer Dryer #1 during periods of oil firing shall not exceed 20% opacity on a 6-minute block average, except for two 6-minute block averages in a 3-hour period.

F. Veneer Drying Process VOCs

Along with the Wood and #2 fuel firing Veneer Dryer #1, Columbia Forest Products is also currently licensed to operate an indirect contact veneer drying kiln (designated Veneer Dryer #2). Veneer Dryer #2 utilizes steam supplied from the facility's boiler units to dry hardwood veneer. Columbia Forest Products plans to install a second new indirect contact veneer drying kiln (designated Veneer Dryer #3). Veneer Dryer #3 is manufactured by Babcock and utilizes steam heat exchange coils (radiators) to heat the interior of the dryer. Columbia Forest Products currently dries wood in five to six week drying cycle periods, with 10 drying cycles periods occurring in a 12-month period.

Columbia Forest Products expects to exclusively dry hard woods in Veneer Dryers #1, #2 and #3, which will include oak, maple, birch and possibly poplar. VOCs are the criteria pollutant associated with the drying of wood. Columbia Forest Products shall be restricted to the following VOC emissions from the drying of wood:

Equipment	VOC Emissions	
	Pounds per hour (lb/hr)	Tons per year (ton/yr)
Veneer Dryer #1	3	13.1
Veneer Dryer #2	1	4.4
Veneer Dryer #3	3	13.1

Due to lack of existing data for emissions from hardwood species, VOC emissions calculations are based on emissions testing performed on the Veneer Dryers #1 and #2 at the Columbia Forest Product's Presque Isle facility in 1995. Columbia Forest Products has proposed an emission factor for the drying of hardwood veneer at their Presque Isle facility of 0.0234 pounds of VOC per 1,000 square feet of veneer dried (lb/ft²) based on the above mentioned emission testing.

In order to demonstrate compliance with the VOC emissions limits, Columbia forest products shall maintain VOC emission records for the facility's veneer drying units. VOC emission calculations shall be based on the above mentioned emission factor for the drying of hardwood veneer and the square feet of veneer dried. The records shall be maintained on a ten-period rolling total basis. The record shall be updated on a schedule that coincides with the facility's drying cycle schedule.

G. Wood Fuel Handling System

Columbia Forest Products utilizes three cyclones in their wood fuel transfer system to control wood dust. Wood waste and dust-laden air are blown to each cyclone to separate the wood particles from the air. Cyclones #1 and #2 are located on the wood fuel storage building. Wood waste and bark generated from the debarking and initial processing of the incoming wood is blown to Cyclones #1 and #2. The wood waste and wood dust drops onto a conveyor system and is delivered into the Boilers #1, #2 and #3 fuel bin.

Cyclone #3 sits atop the waste sawdust silo. This silo is the fuel source for the Energex combustion system of Veneer Dryer #1. Wood waste generated from the production end of the veneer process is hogged and blown to Cyclone #3, where the wood waste and wood dust drops into the waste sawdust silo.

Columbia Forest Products shall establish a system of maintenance, inspection and repair for the wood dust handling system, which shall allow for a monthly inspection of the system and Columbia Forest Products shall document compliance by means of a maintenance, inspection and repair log.

Visible emissions from any cyclone shall not exceed 20% opacity on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period.

H. Splicing Process VOCs and HAPs

VOC emissions are generated as a result of the resin applied as part of the splicing process. Columbia Forest Products reports the annual use of about 45,000 lbs of splicing resin with a VOC content of 0.35% by weight. The splicing resin also contains formaldehyde, a hazardous air pollutant (HAP), at about the same weight percent. Assuming 100% of the volatile components and hazardous pollutants in the resin are emitted, actual VOC and HAP emissions from resin application are each less than 1 ton/year. Columbia Forest Products shall limit VOC and HAP emissions from the Splicing Process to 2.0 tons/year.

I. Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20 percent opacity, except for no more than five minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual 15-second opacity observations which exceed 20 percent in any one hour.

J. VOC RACT

Columbia Forest Products does not emit VOCs from non-exempt equipment greater than 40 tons per calendar year and is therefore not subject to Chapter 134 (Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds) of the Department's Regulations.

K. Annual Emissions

Annual emissions were calculated based on the following:

- Columbia Forest Products shall be restricted to firing no more than 1,250,000 gallons of #2 fuel oil in Boiler #3 and 250,000 gallons of #2 fuel oil in Veneer Dryer #1; the fuel oil having a sulfur content of 0.35% by weight, both based on a ten-period rolling total.
- Columbia Forest Products shall be restricted to firing no more than 10,000 tons of wood in Boilers #1 and #2, 15,000 tons of wood in Boiler #3, and 8,760 tons of wood in Veneer Dryer #1, all based on a ten-period rolling total.
- Columbia Forest Products shall be restricted from firing any wood fuel in Veneer Dryer #1 unless and until Stack #V1 is raised to a height of 65 feet above ground level.

Total Annual Licensed Emissions for the Facility
(Annual licensed emissions are used to calculate license fees)

<u>Pollutant</u>	<u>Emissions in Tons/Year</u>							
	<u>Boilers #1 & #2</u>	<u>Boiler #3</u>		<u>Energex (Dryer #1)</u>		<u>Veneer Dryers</u>	<u>Glue</u>	<u>Total</u>
Fuel combusted	wood	Wood	Oil	wood	oil	-	-	-
PM	24.3	11.5	8.8	6.7	1.4	-	-	52.7
PM ₁₀	14.4	7.0	8.8	3.9	1.4	-	-	35.5
SO ₂	1.1	1.7	43.8	1.0	9.8	-	-	57.4
NO _x	22.1	33.1	1.8	19.3	2.5	-	-	78.8
CO	27.0	27.3	3.1	23.7	0.6	-	-	81.7
VOC	1.8	2.6	0.2	1.5	0.1	30.6	2.0	38.8
HAPs	-	-	-	-	-	-	2.0	2.0

Columbia Forest Products shall not exceed 2.0 tons/year of HAP from the use of resin in the Splicing Process.

III.AMBIENT AIR QUALITY ANALYSIS

A. Overview

A combination of screening and refined modeling was performed to show that emissions from CFP, in conjunction with other sources, would not cause or contribute to violations of Maine Ambient Air Quality Standards (MAAQS) for SO₂, PM₁₀, NO₂ and CO or to Class II increments for PM₁₀ and NO₂. It was determined that Columbia Forest Products does not consume SO₂ increment, therefore a Class II SO₂ increment analysis was not performed.

Since no modification is associated with this licensing action, MEDEP has determined that an assessment of Class I Air Quality Related Values (AQRVs) is not required for CFP.

B. Model Inputs

The ISC-PRIME model was used in refined simple terrain mode to address standards in all areas, including the cavity region. In addition, the COMPLEX-I VALLEY (CI-VM) model was used to evaluate impacts in intermediate and complex terrain, i.e., areas where terrain elevations exceed stack-top elevations.

All modeling was performed in accordance with all applicable requirements of the Maine Department of Environmental Protection, Bureau of Air Quality (MEDEP-BAQ) and the United States Environmental Protection Agency (USEPA).

A valid 5-year hourly meteorological off-site database was used for the refined modeling. The wind data was collected at a height of 10.00 meters at the Caribou National Weather Service station meteorological site during the 5-year period 1985-1989. Missing data were interpolated or coded as missing. Surface data collected at Loring Air Force Base were substituted for missing data. Hourly cloud cover, ceiling height and surface wind speed from Caribou NWS station were used to calculate stability. Hourly mixing heights were derived from surface and upper air data collected at Caribou NWS station.

Modeling stack parameters for CFP and other nearby sources are listed in Table III-1. The ISC-PRIME modeling analysis accounted for the potential of building wake effects on emissions from all modeled stacks that are below their respective formula GEP stack heights.

Table III-1: Stack Parameters

Facility/Stack	Stack Base Elevation (m)	Stack Height (m)	GEP Stack Height (m)	Stack Diameter (m)	UTM Easting NAD27 (km)	UTM Northing NAD27 (km)
CURRENT						
Columbia Forest Products						
Stack 1	161.54	19.81	32.20	0.86	573.421	5172.828
Stack 2	161.54	19.81	32.20	0.86	573.426	5172.831
Stack 3	161.54	19.81	32.20	0.76	573.417	5172.859
Stack V1	161.54	8.72	32.20	0.90	573.463	5172.775
Tatermeal						
Stack 1 (Dryers 1, 2 & 3)	144.78	30.48	31.24	1.83	573.471	5171.334
CURRENT ACTUALS						
Columbia Forest Products						
Stack 1	161.54	19.81	32.20	0.86	573.421	5172.828
Stack 2	161.54	19.81	32.20	0.86	573.426	5172.831
Stack 3	161.54	19.81	32.20	0.76	573.417	5172.859
Stack V1	161.54	8.72	32.20	0.90	573.463	5172.775
Tatermeal						
Stack 1 (Dryer 3 only)	144.78	30.48	31.24	1.83	573.455	5171.317
BASELINE – 1977 / 1987						
Columbia Forest Products						
Stack 1	161.54	19.81	32.20	0.86	573.421	5172.828
Stack 2	161.54	19.81	32.20	0.86	573.426	5172.831
Stack 3	161.54	7.90	32.20	0.79	573.427	5172.763
Stack 4	161.54	7.90	32.20	0.49	573.428	5172.761

Emission parameters for CFP and other nearby sources for MAAQS and increment modeling are listed in Table III-2. Emission parameters for CFP are based on the maximum license allowed operating configuration. For the purpose of determining NO₂ and PM₁₀ impacts, all NO_x and PM emissions were conservatively assumed to convert to NO₂ and PM₁₀, respectively.

Two maximum operating scenarios were included in CFP modeling analysis:

1. Boilers #1 and #2 firing wood; Boiler #3 and Veneer Dryer firing oil,
2. Boilers #1, #2, #3 firing wood; Veneer Dryer firing oil

This modeling analysis did not account for the option to burn wood in the veneer dryer at the current stack height. A previous ambient air quality analysis showed that that Veneer Dryer #1 would not meet Maine Ambient Air Quality Standards during periods of wood firing unless the stack height was raised to 19.81 meters.

Table III-2: Emission Parameters

Facility/Stack	Averaging Period(s)	SO ₂ (g/s)	PM ₁₀ (g/s)	NO ₂ (g/s)	CO (g/s)	Stack Temp (K)	Stack Velocity (m/s)
CURRENT							
Columbia Forest Products							
Stack 1	All	0.05	0.61	0.93	1.13	560.93	4.34
Stack 2	All	0.05	0.61	0.93	1.13	560.93	4.34
Stack 3 (oil)	All	1.86	0.37	0.52	0.13	560.93	9.23
Stack 3 (wood)	All	0.08	0.30	1.48	1.21	560.93	8.89
Stack V1	All	1.06	0.15	0.27	0.08	435.90	12.31
Tatermeal							
Stack 1	All	22.95	5.77	6.20	4.75	423.15	24.75
CURRENT ACTUALS							
Columbia Forest Products							
Stack 1	All		0.14	0.22		560.93	1.05
Stack 2	All		0.14	0.22		560.93	1.05
Stack 3 (oil)	All		0.13	0.66		560.93	8.89
Stack 3 (wood)	All		0.30	1.48		560.93	8.89
Stack V1 (oil)	All		0.02	0.03		435.90	37.35
Stack V1 (wood)	All		0.12	0.60		435.90	37.35
Tatermeal							
Stack 1	All		0.74	3.50		415.93	18.58

Table III-2: Emission Parameters continued

BASELINE – 1987							
Columbia Forest Products							
Stack 1	Annual			0.26		560.93	2.37
Stack 2	Annual			0.26		560.93	2.37
Stack 3	Annual			0.04		350.00	0.37
Stack 4	Annual			0.03		350.00	0.69
BASELINE – 1977							
Columbia Forest Products							
Stack 1	All		0.23			560.93	1.72
Stack 2	All		0.23			560.93	1.72
Stack 3	All		0.03			350.00	0.71
Stack 4	All		0.02			350.00	1.30

C. Single Source Modeling Impacts

SCREEN3 modeling was previously performed for CFP for the maximum, typical, and minimum operating load cases for Columbia Forest Products alone. The highest impact for each stack, independent of receptor location, was added together for each scenario to conservatively determine facility-wide impacts. It was demonstrated that the maximum operating load case for the boilers would result in maximum impacts in simple, intermediate, and complex terrain. ISC-PRIME simple terrain refined modeling, using five years of meteorological data, and CI-VM screening modeling was then performed for CFP's maximum load case.

The modeling results for CFP alone, in simple and complex terrain, are shown in Tables III-3 and III-4 respectively. All SO₂, PM₁₀ and NO₂ averaging period impacts were significant in both modeling analyses. It was demonstrated that CFP would have no significant impacts for all CO averaging periods in simple and complex terrain; thus, no further analysis was required for these pollutant/terrain combinations. Pollutant averaging periods where the respective maximum predicted impact exceeded the respective significance level are indicated in boldface type.

Table III-3: Maximum ISC-PRIME Predicted Impacts from CFP Alone

Pollutant	Averaging Period	Max Impact (µg/m³)	Receptor UTM E (km)	Receptor UTM N (km)	Receptor Elevation (m)	Class II Significance Level (µg/m³)
SO ₂	3-hour	258.73	573.171	5173.278	179.83	25
	24-hour	177.12	573.420	5172.722	161.54	5
	Annual	40.78	573.470	5172.782	161.54	1

Table III-3: Maximum ISC-PRIME Predicted Impacts from CFP Alone continued

PM ₁₀	24-hour	103.49	573.460	5172.652	161.54	5
	Annual	14.023	573.470	5172.782	161.54	1
NO ₂	Annual	22.82	573.470	5172.782	161.54	1
CO	1-hour	546.53	573.071	5173.278	179.83	2000
	8-hour	242.03	573.460	5172.652	161.54	500

Table III-4: Maximum CI-VM Predicted Impacts from CFP Alone

Pollutant	Averaging Period	Max Impact (µg/m ³)	Receptor UTM E (km)	Receptor UTM N (km)	Receptor Elevation (m)	Class II Significance Level (µg/m ³)
SO ₂	3-hour	97.41	572.571	5173.478	204.22	25
	24-hour	27.06	572.571	5173.478	204.22	5
	Annual	8.66	572.571	5173.478	204.22	1
PM ₁₀	24-hour	25.97	572.571	5173.378	201.17	5
	Annual	8.31	572.571	5173.378	201.17	1
NO ₂	Annual	10.88	572.571	5173.378	201.17	1
CO	1-hour	142.25	572.571	5173.378	201.17	2000
	8-hour	99.57	572.571	5173.378	201.17	500

D. Combined Source Modeling Impacts

Because modeled impacts from CFP alone were greater than significance levels for all SO₂, NO₂ and PM₁₀ averaging periods, other sources not explicitly included in the modeling analysis must be included by using representative background concentrations for the area. Northern Maine rural background concentrations derived from representative sites are listed in Table III-5.

TABLE III-5: Background Concentrations (µg/m³)

Pollutant	Averaging Period	Background Concentration	Date
SO ₂	3-hour	24	2003 ¹
	24-hour	13	
	Annual	5	
PM ₁₀	24-hour	32	2003 ¹
	Annual	10	
NO ₂	Annual	11	1995 ²

Notes:

¹ Robinson site, Easton

² TLSP site, Cape Elizabeth

MEDEP-BAQ identified other sources whose impacts would potentially be significant in CFP's significant impact area. Only one other source was explicitly included in the modeling: Tatermeal (Presque Isle).

Table III-6 summarizes the maximum combined source impacts. The predicted impacts are added to conservative background concentrations to obtain the final predicted impact.

All combined source SO₂, PM₁₀ and NO₂ averaging period impacts were below their respective MAAQS. Because the impacts using this method meet MAAQS, no further MAAQS modeling for CFP need be performed.

Table III-6: ISC-PRIME/CI-VM Maximum Combined Source Impacts

Pollutant	Averaging Period	ISC-PRIME/CI-VM Max (µg/m³)	Receptor UTM-E (km)	Receptor UTM-N (km)	Receptor Elevation (m)	Back-ground (µg/m³)	Max Total Impact (µg/m³)	MAAQS (µg/m³)
SO ₂	3-hour	258.73*	573.171	5173.278	179.83	24	282.73	1150
	24-hour	177.12*	573.420	5172.722	161.54	13	190.12	230
	Annual	42.11*	573.470	5172.782	161.54	5	47.11	57
PM ₁₀	24-hour	103.49*	573.460	5172.652	161.54	32	135.49	150
	Annual	14.28*	573.470	5172.782	161.54	10	24.28	40
NO ₂	Annual	23.09*	573.470	5172.782	161.54	11	35.09	100

Key: * = ISC3 Result, ** = CI-VM Result

E. Increment

CFP maximum increment impacts were predicted using ISC-PRIME refined modeling in simple terrain and CI-VM in complex terrain. For addressing increment impacts in intermediate terrain (i.e., terrain above stack top and below plume centerline), the ISC-PRIME and CI-VM were run individually, and the higher of the two increment impacts chosen.

Results of the single and combined source PM₁₀ and NO₂ increment analyses are shown in Tables III-7 and Table III-8, respectively. All CFP alone and combined source modeled increment impacts were below all increment standards. Because the predicted increment impacts meet increment standards, no further increment modeling for CFP needed to be performed.

Table III-7: Increment Consumption in Class II Areas from CFP Alone

Pollutant	Averaging Period	Max Impact ($\mu\text{g}/\text{m}^3$)	Receptor UTM-E (km)	Receptor UTM-N (km)	Receptor Elevation (m)	Class II Increment ($\mu\text{g}/\text{m}^3$)
PM ₁₀	24-hour	12.10*	573.420	5172.722	161.54	30
	Annual	0.38*	573.371	5173.478	179.83	17
NO ₂	Annual	16.85*	573.470	5172.772	161.54	25

Key: * = ISC3 Result, ** = CI-VM Result

Table III-8: Combined Source Class II Increment Consumption

Pollutant	Averaging Period	Max Impact ($\mu\text{g}/\text{m}^3$)	Receptor UTM-E (km)	Receptor UTM-N (km)	Receptor Elevation (m)	Class II Increment ($\mu\text{g}/\text{m}^3$)
PM ₁₀	24-hour	12.10*	573.420	5172.722	161.54	30
	Annual	0.55*	573.371	5173.478	179.83	17
NO ₂	Annual	17.84*	573.470	5172.762	161.54	25

Key: * = ISC3 Result, ** = CI-VM Result

Federal guidance and Chapter 140 of the DEP regulations require that any major new source or any source undergoing a major modification provide additional analyses of impacts that would occur as a direct result of the general, commercial, residential, industrial and mobile-source growth associated with the construction and operation of that source. Since no modification is associated with this licensing action, no additional analyses were required.

F. Class I Impacts

Since no modification is associated with this licensing action, MEDEP has determined that an assessment of Class I Air Quality Related Values (AQRVs) is not required.

G. Summary

In summary, it has been demonstrated that CFP in its current configuration will not cause or contribute to a violation of any SO₂, PM₁₀, NO₂ or CO averaging period MAAQS. It has also been demonstrated that CFP will not cause or contribute to a violation of any PM₁₀ or NO₂ averaging period Class II increment standards.

Should CFP ever opt to burn wood in the veneer dryer, the veneer dryer stack is required to be increased from 8.72 meters (current height) to a new height of 19.81 meters. This stack height increase is based upon the results of a refined modeling analysis completed by MEDEP-BAQ in April, 2003.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-353-71-H-R subject to the following conditions:

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 MRSA §347-C).
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [MEDEP Chapter 115]
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [MEDEP Chapter 115]
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [MEDEP Chapter 115]

- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353. [MEDEP Chapter 115]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [MEDEP Chapter 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [MEDEP Chapter 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [MEDEP Chapter 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [MEDEP Chapter 115]
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [MEDEP Chapter 115]
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
 - A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 - 1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
 - 2. pursuant to any other requirement of this license to perform stack testing.
 - B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

- C. submit a written report to the Department within thirty (30) days from date of test completion.
[MEDEP Chapter 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
- B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
- C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
[MEDEP Chapter 115]
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [MEDEP Chapter 115]
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation.
[MEDEP Chapter 115]

- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [MEDEP Chapter 115]

SPECIFIC CONDITIONS

- (16) Boilers #1 & #2

- A. Total annual fuel use for Boilers #1 and #2 shall not exceed 10,000 tons of wood on a twelve-month rolling total basis. To demonstrate compliance with the fuel cap, Columbia Forest Products shall maintain a fuel use record for the wood fired in the two boilers. The fuel use record shall be maintained on a ten-period rolling total basis. [MEDEP Chapter 115, BPT]

- B. Emissions shall not exceed the following:

Equipment		PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boiler #1	lb/MMBtu	0.54	-	-	-	-	-
	lb/hr	8.1	4.8	0.4	7.4	9.0	0.6
Boiler #2	lb/MMBtu	0.54	-	-	-	-	-
	lb/hr	8.1	4.8	0.4	7.4	9.0	0.6

[MEDEP, Chapter 103, Section 2(A)(3)(a), MEDEP Chapter 115, BPT]

- C. Visible emissions from Stacks #1 and #2 each shall not exceed 30% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a continuous 3-hour period. [MEDEP Chapter 101]

- (17) Boiler #3

- A. Total annual fuel use for Boiler #3 shall not exceed 1,250,000 gallons of #2 fuel oil with a maximum sulfur content of 0.35% sulfur by weight, on a twelve-month rolling total basis. Compliance shall be demonstrated by fuel records from the supplier showing the quantity of fuel delivered and the percent sulfur of the fuel. The fuel use record shall be maintained on a ten-period rolling total basis. [MEDEP Chapter 115, BPT]

- B. Total annual fuel use for Boiler #3 shall not exceed 15,000 tons of wood on a twelve-month rolling total basis. To demonstrate compliance with the fuel restrictions, Columbia Forest Products shall maintain a fuel use record for the wood fired in Boiler #3. The fuel use record shall be maintained on a ten-period rolling total basis. [MEDEP Chapter 115, BPT]

C. Emissions shall not exceed the following:

Equipment		PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boiler #3 (Firing Oil)	lb/MMBtu	0.1	-	-	-	-	-
	lb/hr	2.9	2.9	14.7	4.2	9.7	0.1
Boiler #3 (Firing Wood)	lb/MMBtu	0.17	-	-	-	-	-
	lb/hr	4.1	2.5	0.6	11.8	1.3	0.9

[MEDEP Chapter 115, BPT]

D. Boilers #3 is subject to Federal New Source Performance Standards, Subpart Dc. Columbia Forest Products shall comply with all requirements of 40 CFR Part 60, Subpart Dc including, but not limited to, the following:

1. Columbia Forest Products shall record and maintain records of the amounts of each fuel combusted during each day and the sulfur content of the combusted fuel.
2. Columbia Forest Products shall submit to EPA and the Department semi-annual reports. These reports shall include the calendar dates covered in the reporting period and records of fuel supplier certifications. The semi-annual reports are due within 30 days of the end of each 6-month period.
3. The following address for EPA shall be used for any reports or notifications required to be copied to them:

Compliance Clerk
USEPA Region 1
1 Congress Street
Suite 1100
Boston, MA 02114-2023

- E. Visible emissions from Stack #B3 during periods of wood combustion or during periods of combusting wood and oil in combination shall not exceed 30% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a 3-hour period. [MEDEP Chapter 101]
- F. Visible emissions from Stack #B3 during periods of oil combustion only shall not exceed 20% opacity on a 6-minute block average, except for no more than two 6-minute block averages in a 3-hour period. [MEDEP Chapter 101]

(18) Veneer Dryer #1

- A. Total annual fuel use for Veneer Dryer #1's fuel-fired Proctor Dryer (Heaters #1, #2 & #3) shall not exceed 250,000 gallons of #2 fuel oil with a maximum sulfur content of 0.35%, on a 12-month rolling total basis. Compliance shall be demonstrated by fuel records from the supplier showing the quantity of fuel delivered and the percent sulfur of the fuel. The fuel use record shall be maintained on a ten-period rolling total basis. [MEDEP Chapter 115, BPT]
- B. Total annual fuel use for Veneer Dryer #1's Energex Combustion Unit shall not exceed 8,760 tons of wood on a twelve-month rolling total basis. To demonstrate compliance with the fuel cap, Columbia Forest Products shall maintain a fuel use record for the wood fired in Veneer Dryer #1. The fuel use record shall be maintained on a ten-period rolling total basis. [MEDEP Chapter 115, BPT]
- C. Columbia Forest Products shall be restricted from firing any wood fuel in Veneer Dryer #1 unless and until Stack #V1 is raised to a height of 65 feet above ground level and documentation has been provided to the Department indicating that the Veneer Dryer's stack has been extended. [MEDEP Chapter 115, BPT]
- D. Emissions shall not exceed the following:

Equipment		PM	PM₁₀	SO₂	NO_x	CO	VOC
Heaters #1, #2 and #3	lb/MMBtu	0.1	-	-	-	-	-
	lb/hr	1.2	1.2	8.4	2.1	0.5	0.1
Wood Firing	lb/MMBtu	0.17	0.1	-	-	-	-
	lb/hr	4.6	2.7	0.7	13.2	16.2	1.6

[MEDEP, Chapter 103, Section 2(A)(B)(1), MEDEP Chapter 115, BPT]

- E. Visible emissions from Veneer Dryer #1 during periods of wood firing shall not exceed 30% opacity on a 6-minute block average, except for two 6-minute block averages in a 3-hour period. [MEDEP Chapter 101]
- F. Visible emissions from Veneer Dryer #1 during periods of oil firing shall not exceed 20% opacity on a 6-minute block average, except for two 6-minute block averages in a 3-hour period. [MEDEP Chapter 101]

(19) Veneer Drying Process

- A. Columbia Forest Products shall be restricted to the following VOC emissions from the drying of hardwood veneer in Veneer Dryers #1, #2, and #3:

Equipment	VOC Emissions	
	Pounds per hour (lb/hr)	Tons per year (tons/yr)
Veneer Dryer #1	3	13.1
Veneer Dryer #2	1	4.4
Veneer Dryer #3	3	13.1

- B. Columbia Forest Products shall maintain process VOC emission records for the facility's veneer drying units. VOC emission calculations shall be based on an emission factor of 0.0234 pounds of VOC per 1,000 square feet of veneer dried, and the square footage of veneer actually dried. The Department may approve the use of an alternative emission factor if additional testing leads to the generation of a more appropriate emission factor. VOC emission records shall be maintained on a drying cycle and ten-period rolling total basis. [MEDEP Chapter 115, BPT]

(20) Splicing Process

- A. Columbia Forest Products shall not exceed 2.0 tons/year of VOC from the Re-splicing Process. [MEDEP Chapter 115, BPT]
- B. Columbia Forest Products shall not exceed 2.0 tons/year of HAP from the Re-splicing Process. [MEDEP Chapter 115, BPT]
- C. Columbia Forest Products shall maintain process VOC and HAP emission records for the Re-Splicing Process. VOC and HAP emission calculations from the Re-Splicing Process shall be based on the VOC and HAP weight percentages from the MSDS sheet and the amount of re-splicing resin used. Emission records from the Re-Splicing Process shall be maintained on a ten-period rolling total basis.
[MEDEP Chapter 115, BPT]

(21) Wood Handling

- A. Columbia Forest Products shall establish a system of maintenance, inspection and repair for the wood dust handling system, which shall allow for a monthly inspection of the system and Columbia Forest Products shall document compliance by means of a maintenance, inspection and repair log.
[MEDEP Chapter 115, BPT]

- B. Columbia Forest Products shall operate and maintain the cyclones in a manner that minimizes emissions from the cyclones. [MEDEP Chapter 115, BPT]
- C. Visible emissions from the wood fuel handling equipment (including Cyclones #1, #2 and #3 and the wood fuel conveyor system) shall not exceed 20% opacity on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period.
[MEDEP Chapter 101, MEDEP Chapter 115, BPT]

(22) Fugitive Emissions

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed 20% opacity, except for no more than five minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual 15-second opacity observations which exceed 20% in any 1-hour.
[MEDEP Chapter 101]

- (23) Columbia Forest Products shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 MRSA §605).

(24) Annual Emission Statement

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- 1) A computer program and accompanying instructions supplied by the Department;
or
- 2) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

The emission statement must be submitted as specified in Chapter 137.

(25) Air Toxics Emission Statement

If Columbia Forest Products exceeds the thresholds for HAPs listed in Appendix A of MEDEP Chapter 137 in an inventory year, in accordance with MEDEP Chapter 137 the licensee shall report, no later than July 1 every three years (2005, 2008, 2011, etc.) or as otherwise stated in Chapter 137, the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a computer program supplied by the Department or a written emission statement containing the information required in MEDEP Chapter 137.

NOTE: Based on emission factors developed by the Eastern Research Group (ERG) in their memo "Development of Average Emission Factors and Baseline Emission Estimates for the Industrial, Commercial and Institutional Boilers and Process Heaters National Emission Standard for Hazardous Air Pollutants" dated October 2002, Columbia Forest Products will most likely exceed the Chapter 137 thresholds of HAPs based on fuel burning alone should the facility exceed the following firing rates in a calendar year:

Fuel	Control Device	Quantity of fuel before Chapter 137 toxics reporting threshold is exceeded
Wood/Biomass	Cyclone	1,403 Tons
#2 Fuel Oil	No Control	661,376 Gallons

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437 [MEDEP Chapter 137]

- (26) Columbia Forest Products shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (Title 38 MRSA §605-C).

Columbia Forest Products)	Departmental
Aroostook County)	Findings of Fact and Order
Presque Isle, Maine)	Air Emission License
A-353-71-H-R (SM)	27	

(27) Payment of Annual License Fee

Columbia Forest Products shall pay the annual air emission license fee within 30 days of December 31 of each year. Pursuant to 38 MRSA §353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under 38 MRSA §341-D, subsection 3.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2006.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
 DAVID P. LITTELL, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: **April 8, 2005**

Date of application acceptance: **April 13, 2005**

Date filed with the Board of Environmental Protection: _____
 This Order prepared by, Peter G. Carleton, Bureau of Air Quality